

December 3, 2019

Environmental Protection Agency Region 4
Attn: Barbara Alfano
Atlanta Federal Center
61 Forsyth Street, SW 10th Floor
Atlanta, GA 30303-8960

Re: Three Rivers Planning and Development Brownfields Assessment Coalition Grant Application

Dear Ms. Alfano:

This project aims to address brownfield sources of environmental risk to human health and the environment and, through assessment and cleanup of these sites, to expose and enhance the value of local assets and invest in creative partnerships to expand resource capacity and impact. Thriving universities and community colleges, beautiful natural resources, a growing creative economy, stable automotive and furniture industries, a multimodal port system and waterfront development, a rich artistic and cultural history, and passionate and hardworking people are a foundation we are proud to build on. These amenities, and the site specific value of target properties whose environmental risk can be significantly depleted, will draw sustainable development to these towns. Conversations already being had with supportive partners reveal immense need to address environmental issues in order to capture opportunities for reinstituting a strong sense of place identity in our communities and engaging with development potential. The target sites selected for this project represent a unique culmination of environmental risk that has restricted use and impacted businesses and residents and the opportunity to implement planning strategies that would reignite the physical, social, cultural, and economic space of our communities. Assessing and cleaning these sites would allow new jobs, recreational hubs, creative spaces, and a sense of community to remerge in areas that have suffered from industrial loss, natural disaster, and catastrophic loss of educated young people. As the state appointed planning and development district for the region, Three Rivers has the opportunity and access to address environmental issues in communities that have neither the administrative nor funding capacity to do so on their own. However, as a non-profit entity, TRPDD does not have funds to accomplish this goal without an independent external funding source. We are eager to embrace industries already in place and support entrepreneurial ventures on these sites that will help to rebrand our region and create a sustainable and resilient culture and economy.

1. Applicant Identification: Three Rivers Planning and Development District (TRPDD), 75 South Main Street, P.O. Box 690, Pontotoc, MS 38863

2. Funding Requested:

a. Assessment Grant Type: Coalition

b. Federal Funds Requested:

i. \$600,000

ii. Not applicable: Grant request is not site specific.

c. Contamination Type: Hazardous substances (\$315,100) and petroleum (\$274,900)

Three Rivers Planning & Development District serves as the fiscal and administrative agency for:

3. Location: The Three Rivers Brownfield Coalition includes the City of New Albany (Union County), City of Pontotoc (Pontotoc County), City of Tupelo (Lee County) and the eight Mississippi Counties of Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc, and Union.

4. Property Information: Not Applicable: Coalition Assessment Grant

5. Contacts:

- i. **Project Director:** Jenny Savely, Project Manager, Community and Economic Development Division, (662)489-2415, jsavely@trpdd.com, P.O. Box 690, Pontotoc, MS 38863
- ii. **Chief Executive:** Vernon R. (Randy) Kelley, III, Executive Director, (662)489-2415, vrk@trpdd.com, P.O. Box 690, Pontotoc, MS 38863

6. Population: The eight-county coalition region has a total population 288,189 (US Census). The population of each Coalition member is as follows: City of New Albany, population 8,642, City of Pontotoc, population 5,923, City of Tupelo, population 38,321.

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority brownfields site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1,2,3
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	3
30% or more of the overall project budget will be spend on eligible reuse planning activities for priority brownfield site(s) within the target areas.	N/A

Letter from the State: Letter from the Mississippi Department of Environmental Quality is attached.

Sincerely,



Vernon R. Kelley III
 Executive Director
 Three Rivers Planning and Development District

Three Rivers Planning & Development District serves as the fiscal and administrative agency for:



STATE OF MISSISSIPPI

PHIL BRYANT

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

GARY C. RIKARD, EXECUTIVE DIRECTOR

November 25, 2019

Ms. Jenny Savely
Project Manager
Three Rivers Planning and Development District
75 S. Main Street | P.O. Box 690
Pontotoc, MS 38863

**RE: EPA Brownfield Grant Application Acknowledgement
104(k) Coalition Assessment Grant
Three Rivers Planning and Development District**

Dear Ms. Savely:

The Mississippi Department of Environmental Quality (MDEQ) hereby acknowledges the Three Rivers Planning and Development District's (TRPDD) plans to lead a Coalition including the Cities of New Albany, Tupelo, and Pontotoc to conduct brownfield assessments and apply for federal grant funds through the United States Environmental Protection Agency's (EPA) Brownfields initiative. As industrial decline has affected hundreds of thousands of residents and led to abandoned, underutilized, and contaminated brownfield sites, MDEQ is expressly interested in seeing entities like the Coalition taking the initiative to assess, remediate, and return these sites to productive use. These efforts are consistent with our mission to safeguard the health, safety, and welfare of present and future generations of Mississippians.

MDEQ looks forward to our continued role in the Coalition's Brownfield Initiative and are available to assist you at any time. Should you have any questions or comments concerning this matter, please contact me at (601) 961-5240.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas L. Wallace".

Thomas L. Wallace, P.E.
Branch Chief – GARD I
Mississippi Brownfield Coordinator

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

AN EQUAL OPPORTUNITY EMPLOYER

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Areas

Three Rivers Planning and Development serves as the Planning and Development District (TRPDD) for eight rural counties in Northeast Mississippi (Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc, Union) and their 39 municipalities representing a population of 288,189. TRPDD has assembled a Coalition of three target communities to join as the principal target areas for Brownfield Assessment Grant funding - the City of New Albany, City of Tupelo and City of Pontotoc, that are among the most vulnerable and growth prone communities in the region. Target areas reinforce the larger population in our region as central hubs for arts and music, outdoor recreation, educational opportunities, employment, and community growth that weave a tapestry of place, identity, and cultural connectedness. Known and potential environmental hazards resulting from the outmigration of manufacturing, numerous tornadoes and flooding events, and abandonment of facilities as population shifts out of rural communities limit growth and pose risk to citizens in target areas that lack the funds to support remediation.

Target communities and sites in the initial inventory have been identified in conjunction with local and regional elected officials, community residents, local developers, and community planners as identified in municipal Zoning and Redevelopment Plans as those facing the most significant brownfield challenges within the Region. The initial inventory includes more than seventy (70) properties in Coalition area and larger Three Rivers footprint significantly impacted by industrial fluctuations, concentrated poverty, demonstrate the capacity to positively impact the largest number of community members, and have the greatest environmental health outcomes with remediation assistance. TRPDD has gained access to thirteen (13) and is confident in remaining properties.

New Albany, MS (Pop. 8,642), named America's Best Southern Small Town by USA Today, has seen a resurgence contributing to an increase in the downtown business community. A refreshed economic focus has led to an increase in retention of young professionals to the area, yet New Albany's resilience remains hindered by parcels within their redevelopment planning footprint that pose potential environmental risk to residents and surrounding businesses. The Carr Oil property, for example, is a bankrupt former fuel terminal surrounded by residential and retail property with known historical groundwater issues. Similarly, the Tallahatchie River waterfront properties are undeveloped and potentially contaminated due to past use and illegal dumping, degrading the River's role as one of the town's most important cultural and economic resources. **Tupelo, MS (Pop. 38,321)** has intentionally invested in its role as the home of the Natchez Trace Parkway, Elvis' birthplace, and a part of the National Blues Trail. However, Brownfield sites such as the former textile mill, the dairy processing plant, and former salvage yard in Tupelo, the largest and fastest growing of Coalition communities are positioned in central areas bordered by residential and retail properties, hinder continued development. The Block Corp property, located in an Opportunity Zone, is particularly central to growth in Tupelo West, a low income community experiencing revitalization. Between New Albany and Tupelo lies the unassuming **Pontotoc, MS (Pop. 5,923)**, the home of TRPDD as well as brownfield sites that represent devastating risk to an already impoverished, disadvantaged community. Pontotoc is a bedroom community for commuters to nearby Memphis, Tupelo, Birmingham, Columbus Air Force base, and Toyota in Blue Springs. Invested locals are attempting to revitalize local character as a unique draw for families to attract and hold a population of high skilled laborers in the area. As partners, these specific microcommunities, with their historical context and current relevance, serve as regional leaders that are able to have the most significant impact on the region and therefore on their home fronts. However, the brownfield challenges they face limit opportunities for redevelopment that can move the region forward, such as new diverse jobs and improved quality of life measures that are desperately needed. These communities' future relies on addressing environmental risk and protecting natural resources such as the Tallahatchie River waterfront, encouraging growth in major City centers such as the Block Corp property, limiting exposure to disadvantaged populations near Pontotoc's landfill, and protecting the watershed under the Carr Oil property in New Albany. Priority sites in the Coalition have thwarted growth in a region scarred by disaster, poverty, and the syphoning of resources from rural America. With funding assistance, they can actualize long term and wide ranging plans that address the needs of the most vulnerable in our area.

1.a.ii. Description of Brownfields Sites

Carr Oil Property, New Albany, MS: In 2014, the MDEQ Emergency Response Program was alerted by residential and commercial neighbors of strong petroleum odors in their homes and businesses. During the subsequent

investigations, MDEQ Emergency Responders found strong petroleum odors in the sewer lines and put corrective measures into place. As a follow up, MDEQ required Phase I and II Environmental Site Assessments (ESAs) of the Carr Oil Company Bulk Petroleum Storage Facility. Investigations identified free-phase petroleum and determined that releases both on-site and off-site exceeded acceptable limits. MDEQ required that the owner implement corrective action measures and continue monitoring. Soon after the owner filed for bankruptcy and has abandoned the facility, posing potential risk to the Upper Tallahatchie River Watershed and to surrounding residents. The responsible party was unable and unwilling to remediate petroleum impacts. Site conditions have not been monitored in more than 5 years due to the bankruptcy, and new ESAs are required to assess current site conditions. The property is currently delinquent on taxes and could be acquired by the City as part of their redevelopment plans given the site's key location on the main travel corridor. The known groundwater contamination and potential for vapor intrusion remain a risk to neighboring residential and commercial property, and makes this site a priority target for assessment. The Coalition has site access for ESAs.

Tallahatchie River Property, New Albany, MS: This 7-acre waterfront property is located at the intersection of W. Bankhead St., the major artery through the downtown district, in proximity of 758 residents, 54% of which are minority, and the Tallahatchie River. Past uses of the property included an automotive dealership and mechanic shop, later a John Deere farming equipment sales and maintenance facility, all constituting a Recognized Environmental Condition (REC). With all traces of the structures removed, the area fell victim to use as an illegal dumping ground for waste tires, unwanted farming equipment and other trash and debris, forcing the city to expend funds to address the illegal dumping and increase police patrols of the area. The location, while developmentally ideal, still carries stigma related to potential contamination from past operations and the illegal dumping. Concern for water quality and risk of continued erosion of the riverbank has amplified the desire to responsibly remediate and develop the parcel in order to respond to the City's growing need for outdoor recreational opportunities and investment interest in waterfront space. Additionally, there is concern regarding exposure risk to vagrants and residents using the area as a fishing site. Protecting this watershed, preventing erosion on the embankment and providing bank stabilization, and eliminating risk to residents using the site is the utmost priority for the site owner (non-PRP) who is prioritizing environmental protection in both their business plan and redevelopment plan for the site. The Coalition has site access approval for ESAs from property owners.

Former Pontotoc City Sanitary Landfill, Pontotoc, MS: Prior to the enactment of RCRA Subtitle D, the Pontotoc City Sanitary Landfill was used as a dump site for this small community's municipal waste. Aside from household waste, personal accounts report that this landfill was largely used for the disposal of containerized acetone and other chemicals from the then local Ram Golf manufacturing plant, whose chief output was golf balls. Assessment is necessary to confirm these reports and determine remediation needs. Upon being decommissioned as a dump site in 1994, soil testing was required to close the site. However, data from this testing is difficult to locate and increased concern over material release and knowledge of improved testing practices have called into question the safety of the area, particular in regard to potential groundwater impact and the naturally occurring surface water bodies that exist nearby, representing risk to the surrounding community, primarily low-income minority homeowners. After decommissioning, the site converted ownership from the City to the previous owner who is financially unable to address the cost of further testing or cleanup. Post-closure, this site has also continued to be used for illegal dumping, placing further financial burden on the public. Without initial assessments it is unclear whether this site qualifies for landfill specific mitigation programs.

Former Block Corp. Textile Mill, Tupelo, MS: On Tupelo's Main Street lies a former textile mill operation that remained open for more than 50 years until the early 2000s and was partially demolished after tornado damage in 2012. There is concern that use, storage and disposal of dyes and chemicals from the textile operation may have led to off-site shallow groundwater contamination on the surrounding residential and light commercial properties. Partially due to this concern, some adjacent parcels have been abandoned through tax forfeiture and are now owned by the City. An adjacent parcel is a former gas station recently used as a motorcycle repair shop which may have also contributed to contamination of the area. There is currently no information regarding the proper storage and sale of petroleum at the former service station and the closure status of their underground storage tanks are currently unknown. The former textile mill and surrounding vacant parcels represent a target area of approximately 40 acres. Risk of contamination to these sites and potentially off-site residential properties poses concern for groundwater, soil and vapor exposure for the surrounding residential community, adjacent park, and for area youth using abandoned sites for recreation.

1.b. Revitalization of Target Areas

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

This project builds on TRPDD's Comprehensive Economic Development Strategy (CEDS) and individual target area strategic action plans for development. The scope of these strategies include identification of viable resources in each target area, including water, sewer, gas, and other infrastructural needs, as well as feasibility analysis for successful repurposing uses of land and remaining structures. Each target site's assessment and possible mitigation addresses a priority redevelopment strategy to stimulate economic benefit. At the **Tallahatchie Riverfront**, an energy efficient green city center with outdoor recreation venues and waterfront housing is being planned by the current owner and support from the community solicited. Prospective retail, outdoor, recreation, food service, and childhood and early education businesses with multiple potential partners expressing interest and partnership are actively being pursued. At **The Carr Oil Property** Successful local business, Futurian, wishes to expand the administrative structure of its current operations over the footprint of the former fuel distribution facility. Enhancing recreational access and increasing diverse business opportunities like these is at the heart of TRPDD and Coalition member economic development. At the **Pontotoc Landfill** site, the City is developing a Master Plan for the expansion of the adjacent City owned sportsplex and park. The City of Tupelo is examining the **Block Corp property** related area for expansion of the Ballard Park Recreation Complex and is working with a developer on the Block Corp specific site on retail recruitment on the property and surrounding area. Redefining a sense of place as the source of collective identity and improving overall quality of life are central to redevelopment plans for the region. Improved job opportunities accompany emphasis on recreational space and the creative economy to encourage placemaking that creates a sense of home. The community centered approach of this project relies on redevelopment of the target areas of this project with stakeholders and citizens alongside practice and theory-based models to proceed with equitable and environmentally sustainable development. This model promotes an asset and place-based paradigm defining communities by their needs and resources. Priority site redevelopment according to the CEDS is consistent with the Revitalization Plans of each Coalition member.

1.b.ii. Outcomes and Benefits of Reuse Strategy

Priority properties in target areas have lost opportunities due to the potential risk of environmental contaminants and represent the locations of greatest impact to support the surrounding communities through availability and diversity of jobs. Redevelopment of sites would not only provide employment opportunity but would create new businesses, creating new personal and sales tax revenue for the communities to invest in future opportunities and improve the quality of life of their citizens. The assessment of these properties will also create a mechanism for the mitigation or removal of the risk of exposure to contaminants, eliminating any further impact to human health and the environment. By decreasing overall environmental risk, the Coalition believes the region can respond to adverse health outcomes (See Section 2.a.ii) by improving access to greenspace and healthy living, keys to retaining a young, diverse, and educated population. Employment opportunities on these sites will create a multiplier effect of increased investment, reduced commuting time, and green recreational use that reduces overall emissions and exposure.

The Tallahatchie Riverfront Property in New Albany, MS has development potential for mixed use housing with 10-12 new businesses and approximately 60 new jobs. The site of the former fabric mill and adjacent vacant parcels in Tupelo, MS represent 40 acres of development on commercially zoned property in the central business district of Northeast Mississippi. Remediation of this property would also contribute to economic growth in the designated Opportunity Zone. The Carr Oil property in New Albany, MS has prevented the development of the surrounding area, including new residential and commercial properties. Expansion of the Pontotoc Sportsplex at the former landfill will provide improved quality of life opportunities to support families and entice new residents as well as increase property values in the target area.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

TRPDD will provide community planning and economic development services to the Coalition and brownfields developments in the TRPDD region. In this role, TRPDD will leverage funds to support remediation and redevelopment of priority sites. Since 2005, the Community and Economic Development Division has secured \$647 million in grant funding, almost \$36.5 million in loans, \$1.7 billion in company investment, \$77 million in local community investment, and leveraged other investment totaling \$17.5 million. These resources have led to the creation of 10,000 jobs in the region and helped retain 6,500. TRPDD has secured funding through the New Market Tax Credit program and has Tax Credit Authority from the Department of Treasury to offer a 39% tax credit against

federal income tax to investors to offset the perceived or real risk of investing in low income communities. **The Block Corp.** site as well as other sites within the inventory lie within eligible areas for this credit. Other leveraging opportunities that can directly benefit redevelopment of target brownfields sites are as follows:

Leveraging Tax Incentives	Description	Priority Site Application
Mississippi Economic Redevelopment Act (MERA)	Private Sector Incentive - The MDEQ Brownfields Program provides developers an opportunity to recover remediation costs expended for the site with a 2.5 multiplier by reimbursing with sales, income and franchise taxes generated at the site.	All priority sites are eligible for this funding, to assist with the completion of mitigation and redevelopment
MS Brownfields Voluntary Cleanup and Redevelopment Incentives Act	Assessment, investigation, remediation, monitoring and related activities at a brownfield agreement site are eligible for a 25% tax credit the year incurred, up to \$40,000 or amount of the annual income tax imposed.	Redevelopment of Tallahatchie River Property, Carr Oil property, and Block Corp target sites.
MS Historic Preservation Tax Incentives Program	Offers at 25% tax credit for the rehabilitation of historic structures used for residential or business purposes. A project must exceed \$5,000 or 50% of the total basis of the building.	Redevelopment on sites with salvageable structures, primarily on expanded inventory, but may apply to Block Corp
MS Department of Revenue Business Incentive Tax Credits	An income tax credit is available for a five (5) year period equal to a percentage of payroll for each newly created job of an eligible business. A minimum number of jobs must be created to receive the credit.	Redevelopment of Tallahatchie River Property, Carr Oil property, and Block Corp
Opportunity Zones	If the investor holds the investment in the Opportunity Fund for at least ten years, the investor would be eligible for an increase in basis equal to the fair market value of the investment on the date that the investment is sold or exchanged. Seven of TRPDD's eight counties have apportioned opportunity zones.	Redevelopment of Block Corp property, which lies inside of Opportunity Zone eligible area

1.c.ii. Use of Existing Infrastructure

The overall goals of the Coalition include reuse of all viable existing infrastructure and structures. Redevelopment of properties with functional utilities in place is a particular goal, as doing so will preserve the region's undeveloped areas, prevent sprawl and degradation of natural resources, and prevent impact to vulnerable populations in more remote areas of the region. Unless necessary for removal to complete site remediation, all existing infrastructure will remain in place on assessed sites and be addressed in redevelopment planning. The use of existing structures will be prioritized in Reuse and Redevelopment plans, particularly with consideration for historic preservation.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding

Coalition communities lack administrative capacity and a local source of funds that prevent access to resources to address brownfields challenges. **As the State designated planning and development entity for the region, the mandate of TRPDD does not provide direct funding for development projects.** TRPDD lacks the ability to provide direct funding from their budget, but has the ability to organize funding from local, state and federal governments, identify external funds from private stakeholders, as well as provide the ability to administer funds and ensure adherence with program objectives to meet both local and regional planning goals. Regional communities and State and Federal funds support TRPDD allowing them to provide planning and resources for enhanced economic development, providing that function for communities that lack the in house capacity and experience to fund and manage brownfield projects. As a Coalition with EPA funding, TRPDD would be able to manage the assessment of properties in these communities, otherwise without resources to do so, to define impact and provide for much needed corrective action planning at target sites.

Historically, target site communities, and those in the TRPDD region generally, have encountered industrial decline in both farming and furniture manufacturing in the last 30 years and experienced severe economic decline from 2009-2012 after the great recession. In addition, many counties in the region have been declared disaster areas due to severe tornado damage that frequently destroys personal and commercial properties. For our region, poverty was at 18.9% in 2016 with new reports indicating we are now over 20%, still well above the national average of 14.6%.¹ The crises that plague our community as a result of low income cannot be exaggerated. Housing, education, health, access to transportation, childcare, infrastructure, and environmental health suffer without significant outside investment. Municipal funds, therefore, are not available for the much-needed work of assessing potentially environmentally contaminated properties. **Since ownership of many target site parcels are the result of tax forfeiture, these sites are often left unaddressed.** Private owners struggle with remediation costs due to the extent of contamination and potential hold on business during cleanup. Assessment funding will, in particular, allow communities the ability to identify and reduce the incidence of specific threats to vulnerable and disenfranchised communities and allow Coalition members to assist in addressing and preventing threats caused by environmental hazard.

2.a.ii. Threats to Sensitive Populations

2.a.ii. (1) Health or Welfare of Sensitive Populations

	National	Mississippi	TRPDD	Union	Lee	Pontotoc
Poverty¹	14.6%	21.5%	19.9%	17.1%	19.4%	12.6%
Disabled	41.4%	33.6%	32.6%	26.7%	33.1%	38.2%
≥ 65	14.9%	14.6%	14.7%	16.8%	14.5%	16.8%
Minority Population	44.6%	44.2%	30.9%	44.2%	43.2%	48.7%
Single Parent HH	34.5%	46.3%	40.4%	29.5%	50.5%	36.4%
Renter Occupied Housing	36.2%	31.9%	31.3%	42.3%	41.3%	34.5%
≤ 18	22.9%	24.3%	23.7%	27.4%	27.1%	28%
Disconnected Youth	2.7%	4.0%	5.1%	.9%	6.4%	9.2%

Target communities represent environmental justice priority areas as they contain the highest concentration of sensitive populations in the Region. The population of these communities include high concentrations of vulnerable populations such as people living in poverty, the disabled, the elderly over the age of 65, single parent households, renters, children under the age of 18, and disconnected youth. One in four people in the TRPDD Region live in poverty. Slightly less than half the population in each target area is minority. (See table above) Priority communities represent environmental justice target areas that contain disadvantaged population at increased risk of exposure. Target area residents have all been victim to natural disaster. These characteristics exacerbate the vulnerability to experiencing increased risk of environmental hazard and disproportionate exposure, which can be lessened with assessment and mitigation response. The extent of the grant's ability to assist in identifying and reducing risk is related to the conditions directly able to be examined and responded to in each target area. **The Coalition will prioritize assessment and remediation of brownfield sites disproportionately disadvantaging vulnerable populations who will also receive the greatest benefit from the contribution of brownfield funding.**

2.a.ii. (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Target communities, once rural farming communities saturated with dairy processing, equipment manufacturing and repair, heavy equipment storage, textile mills, oil and petroleum storage, scrap yards, and rubber manufacturing, are fraught with suspected exposure from these facilities. Underground and above ground storage tanks and equipment and transportation related facilities pose risk from petroleum products. Previous mills, factories, and government buildings have a significant presence of asbestos. Disused and currently active industrial sites emit pollutants such as volatile organic compounds (VOCs), hydrocarbons (HC), nitrogen oxides (NO_x), lead paint, and carcinogens. Sources include multiple garment factories, a WWII munitions plant, fertilizer plants, gravel and mining facilities, and grain mills. These facilities are or have been situated near or along the Tallahatchie River, Tennessee-Tombigbee Waterway, and multiple tributaries that feed U.S. Army Corp watershed lakes as well as the aquifer systems supporting the area. Entrenchment of chemicals and toxins into vital water systems risks exposure of the entirety of the region's population.

¹ JobsEQ. Economic Profile, Three Rivers Planning and Development Region. jobsseq.eqsuite.com.

Prolonged exposure to these substances can contribute to general degradation of health outcomes and increases the hazard of developing chronic and life threatening disease. The *Mississippi Department of Health* reports that from 2010-2014 blacks in Union County were 1/3rd more likely to have and die from cancer. During the same time period, black residents in Lee and Union Counties were 1/3rd more likely to die of heart disease related incidents as whites, however, the opposite is true of Pontotoc County, despite the two having only slight differences in population makeup. In Lee, African-Americans were also twice as likely to die from a stroke as white residents. The *CDC National Program of Cancer Registries Cancer Surveillance System (NPCR-CSS) 2018* reports the incidence of cancer per 100,000 people is 499 in Lee County, 454 in Union, and 456 in Pontotoc, all higher than the national average of 448. The *Mississippi Statistically Automated Health Resource System (MSTAHRS)* finds that infant mortality, relative to the national average of 5.9 incidents per 1000 births, and 9.2 statewide, all three target areas reported 10.6 in 2015. Addressing and eliminating sources of exposure and, therefore, decreasing threat is an imminent need in target areas, already struggling with adverse health outcomes. Environmental response through grant funding will allow an opportunity to decrease overall impact.

2.a.ii. (3) Economically Impoverished/Disproportionately Impacted Populations

Lack of affordable housing, income inequality, lack of access to fresh food, access to diverse job opportunities, and degradation in the economy that limits access to capital exacerbate cumulative impacts of environmental problems. The TRPDD region has a median household income is \$41,960, compared to \$57,652 nationally. These rural communities, two less a population less than 10,000 and one less than 50,000, continue to experience brain drain and a continued cycle of poor investment and decreased growth. Unknown potential contaminants exacerbate potential cost and deter development. Target areas represent specific environmental justice communities that experience disproportional vulnerability to the impact of exposure to hazardous materials and petroleum related pollutants. The target communities once represented thriving farming and furniture manufacturing centers in Pontotoc, Tupelo, and New Albany. Today, abandoned gas stations, vacant industrial buildings, and degraded acreage populate the major arteries of the cities. Grant funds would address disproportionate impact by supplying resources to provide contracts to local businesses, integrate affordable housing measures, pursue minority contractors, create inclusionary zoning in developments, provide healthy food in retail spaces, support local entrepreneurial activities, and provide equal lending opportunities for development of brownfields, for example. **The revitalization of brownfields aims to provide job opportunities and improved quality of life to communities while reducing environmental threat and providing a standard for development that encourages holistic and sustainable growth.**

2.b. Community Engagement

2.b.i. Project Partners and 2.b.ii. Project Partner Roles

TRPDD and Coalition members have assembled a Brownfields Advisory Committee (BAC) made up of community leaders, citizens, businesses, chambers of commerce, neighborhood groups, and local/state/federal stakeholders. These partners will strategically identify sites and provide technical expertise, planning, and feasibility studies to inform the best reuse of remediated brownfields to provide maximum economic, environment, and social benefit. Quarterly public meetings with these partners will help maintain open dialogue to continual discuss priority sites and review with the contracted environmental consultant. The partners in each Coalition member community that have been secured are:

Partner	Area	Contact	Assessment Coalition Role	Site Specific Role
Tennessee Tombigbee Water Management District	Pontotoc County, TRPDD region	Jack Savely Jack.savely@gmail.com ; 662-419-5924	Site Selection; Service on Advisory Committee	Waterfront property consultation, waterway site identification
New Albany Main Street Association	New Albany, Union County	Mary Jennifer Russell maryj@sugarees.com ; 662-538-9379	Business Retention and Expansion, Community Outreach	Education, community input, and recruitment of business at Tallahatchie Site; Represents business community

Partner	Area	Contact	Assessment Coalition Role	Site Specific Role
MDEQ	All	William McKercher wmckercher@mdeq.ms.gov ; 601-540-6389	Technical Assistance, Certify Petroleum Sites	Assist in adaptive remediation of brownfields; protection of environmental health
Tupelo Rocks Community Initiative	Tupelo, Lee County	Amanda Hayden cafe_212@hotmail.com ; 662-844-6323	Community Outreach, Advisory Committee	Development and consultation regarding Main Street sites
Union County Heritage Museum	New Albany, Union County	Jill N. Smith jill@uchheritagemuseum.com ; 662-534-0014	Public meeting space and information opportunities	Site development related information of Union county sites
Monroe County Chamber of Commerce	TRPDD Region	Chelsea Baulch chelsea@gomonroe.org ; 662-256-7194	Business Retention and Expansion	Consultation on Monroe County and waterfront sites in TRPDD region

2.b.iii Incorporating Community Input

Awards and achievements related to brownfields by the Coalition will be advertised in newspapers of target area communities, social media, and radio. Public BAC meetings advertised in this way provides an appropriate and effective way of communicating and receiving feedback since the community receives information in these forums. Additional actions will include: Public Service Announcements (PSAs) in local papers, monthly progress updates posted on the TRPDD website with responses to questions and comments provides in monthly website and print media updates, copies of Phase I and II ESAs and Cleanup Plans in local libraries, and Brownfield project informational material at Coalition member offices and public venues in the community. Meetings will include 1) initial introductory meetings after “notice to proceed” 2) quarterly community meetings throughout the duration of the project 3) public meetings after 50% of Phase I ESAs are complete 4) after 50% after Phase II ESAs are complete 5) at the completion of assessments to explore additional avenues for redevelopment. All meetings will be held in accessible public buildings with adequate advance notice and the opportunity for feedback. Meeting spaces will rotate through target area communities in facilities that are ADA compliant and located in accessible areas to accommodate disadvantaged populations. TRPDD offices are central in Pontotoc as is the Union County Heritage Museum in New Albany, and the City of Tupelo’s revitalized brownfield, Fairpark District community park. **Feedback received from the public will be incorporated into the decision making process by the BAC to determine prioritization of sites and allocation of resources.**

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks, Activities, and Outputs

3.a.i Project Implementation

The goal of this project is to maximize the number and efficacy of Phase I and II Environmental Site Assessments and Remedial Action Plans (RAPs) for the Coalition. Within three months of the grant award, TRPDD will procure a Qualified Environmental Professional (QEP) to perform technical tasks. Alongside the QEP and Brownfields Advisory Committee (BAC), the Coalition will develop a site inventory and begin performing Phase I and II ESAs and RAPs on 25% of sites within 6 months. Remaining sites, according to prioritization by the Coalition and BAC, will be completed in the following 18 to 24 months.

Task 1. Community Outreach and Involvement: \$33,000

- i. Project Implementation: The Coalition Grant Manager will closely coordinate with the Coalition partners to develop a Community Involvement Plan (CIP) that will meet the needs of the community at large. The Coalition anticipates engaging the community in all aspects of the implementation of the grants including site selection and prioritization, cleanup alternatives, and redevelopment planning as addressed in Section 2.b. Quarterly public meetings alongside quarterly BAC meetings will inform the public and provide an opportunity for feedback and Q&A for questions that will be publicly available on social media and Coalition member websites. Input from the community will be engaged through these outlets as well as local newspapers.
- ii. Anticipated project schedule: Implemented upon grant award, completed in the 3 year grant window.
- iii. Task/ Activity lead(s): BAC, TRPDD
- iv. Outputs: 12 public meetings, fact sheets and news briefings (as required)

Task 2. Site Inventory and Prioritization: \$12,000

- i. Project Implementation: The BAC will establish site eligibility and land use plans beyond the four (4) target sites where access already exists, determining priority sites by selection, evaluate and refine inventory, and prioritization criteria after the development of a cooperative oversight agreement with EPA. Criteria will follow guidelines requiring 1) potential to address or eliminate environmental, social, economic, public health, and/or safety issues 2) benefit to vulnerable populations 3) emphasis on environmental protection in redevelopment plan 4) alignment with community revitalization strategy 5) community wide quality of life impact. Evaluations on a site specific basis will include economic analysis of target areas to ensure they are capable of reasonably attracting investors to provide the necessary economic support to facilitate risk mitigation and redevelopment of the property. These evaluations will be used to rank priority sites for assessment and developing cleanup plans to ensure funds are utilized responsibly for facilities that can reach the end goal of economically viable and environmentally sustainable reuse and can be completed in the first year of the grant cycle.
- ii. Anticipated project schedule: Complete inventory in first year, modifications will be made as warranted in years 2 & 3 for inclusion of newly identified project sites.
- iii. Task/ Activity lead(s): BAC, TRPDD
- iv. Outputs: 36 conference calls, 12 public meetings, web-based GIS map of site inventory

Task 3. Phase I and Phase II ESAs and QAPP Preparation: \$465,000

- i. Project Implementation: The QEP will perform this task. 10-15 hazardous substance and 10-15 petroleum Phase I ESAs will be performed per EPA's All Appropriate Inquiry (AAI) requirements and ASTM E1527-13, including target sites and subsequently identified priority sites in the regional inventory. The QEP will prepare a generic Data Quality Objectives and Quality Assurance Project Plans (QAPPs) for USEPA and MDEQ approval, obtain access to sites, conduct an estimated 20-30 Phase I ESAs. Site-Specific Addendums to the generic QAPP corresponding Phase II ESAs will be completed for sites with RECs selected for further evaluation based upon economic viability and environmentally sustainable reuse. The QEP will conduct Phase II work per ASTM 1903-11 and VAP and VRP guidance.
- ii. Anticipated project schedule: Complete by the end of the 3rd quarter of year 3 to allow time for final reporting on the grant.
- iii. Task/ Activity lead(s): BAC, TRPDD, Qualified Environmental Professional
- iv. Outputs: 10-15 hazardous waste Phase I ESAs, 10-15 petroleum site Phase I ESAs, ~12 Site Specific QAPPs; 6-8 hazardous waste site Phase II ESAs, 6-8 petroleum site Phase II ESAs, 1 QAPP; ~5 ABCAs

Task 4. Remedial and End Use Planning: \$31,000

- i. Project Implementation: An estimated 3 hazardous substance sites and 2 petroleum sites will be examined for remedial action planning alongside an Analysis of Brownfields Cleanup Alternatives (ABCA), prioritizing target sites. Development of an RAP will include Coalition and BAC as well as property owners and developers. RAPs will inform pursuit of cleanup funding from MDEQ and private investors.
- ii. Anticipated project schedule: Complete by the end of the 3rd quarter of year 3 to allow time for final reporting on the grant.
- iii. Task/Activity lead(s): BAC, TRPDD, Qualified Environmental Professional
- iv. Outputs: Redevelopment and Reuse plans, visioning session documents, an anticipated 60 jobs, and more than 1000 acres ready for reuse on which exposure is minimized, 250 of which is intended to be redeveloped greenspace acreage; ~5 Remedial Action Plans

Task 5. Program Management: \$59,000

- i. Project Implementation: This task includes programmatic implementation activities for contractor oversight, review of work product, and providing monthly status, quarterly and closeout reports to US EPA. This task also includes completion of Property Profile information as properties being assessed are entered into the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database. Expenses for travel to the regional and national EPA Brownfields conferences are also included in this task.
- ii. Anticipated project schedule: To be implemented and completed in the 3 year grant window.
- iii. Task/Activity lead(s): TRPDD

iv. Outputs: QEP procurement, Community Involvement Plan (CIP), eligibility forms, 10 quarterly reports, project closeout, final performance/financial reports, Marketing and Economic Evaluations

3.b. Cost Estimates and (3.b.i – 3.b.iii)

Budget Categories		Comm. Outreach	Site Inventory	ESAs/QAPP	Remedial and End Use	Program Mgmt.,	Total
Personnel	HS	\$7,500	\$7,000	\$5,000	\$7,500	\$17,500	\$44,500
	Pet	\$7,500	\$5,000	\$5,000	\$7,500	\$17,500	\$42,500
Fringe Benefits		–	–	–	–	–	–
Travel		\$2,166	–	–	–	\$6,000	\$8,166
Equipment		–	–	–	–	–	–
Supplies		\$2,000	–	–	–	\$2,000	\$4,000
Contractual	HS	\$6,917	–	\$245,000	\$9,600	\$8,000	\$269,517
	Pet	\$6,917	–	\$210,000	\$6,400	\$8,000	\$231,317
Other		–	–	–	–	–	–
Total Direct Costs		\$33,000	\$12,000	\$465,000	\$31,000	\$59,000	\$600,000
Indirect Costs		–	–	–	–	–	–
Total Budget		\$33,000	\$12,000	\$465,000	\$31,000	\$59,000	\$600,000

- **Community Outreach and Involvement: Personnel:** \$7,500 hazardous waste (150 hrs at \$50/hr; 25 hr/qtr), \$7,500 petroleum (150 hrs at \$50/hr; 25 hr/qtr) Work w/ contractor developing informational brochures, PSAs, website updates; public meeting materials. Lead Partners Meetings and quarterly public meetings. **Contractual:** \$6,917 hazardous waste, \$6,917 petroleum, Travel: 6 public meetings at \$2,166 **Supplies:** Meeting Materials, \$2,000
- **Site Inventory: Personnel:** \$7,000 hazardous waste (140 hrs at \$50/hr; 40 hr/quarter (qtr) for first 6 qtrs), \$5,000 petroleum (100 hrs at \$50/hr; 40 hr/quarter (qtr) for first 6 qtrs) Coordinate with partners and community to identify potential future uses for brownfield properties; Perform Target Area Economic Evaluations as needed. Outputs include GIS web based inventory, community meetings, and need and asset mapping of inventoried sites.
- **ESAs/QAPP Preparation: Personnel:** \$5,000 hazardous waste (10 hrs at \$50/hr), \$5,000 petroleum (10 hrs at \$50/hr); Oversee site eligibility, access agreements, review Phase I /II ESAs prior to submittal. **Contractual:** \$245,000 hazardous waste, \$210,000 petroleum (GOOD FAITH ESTIMATES - 1 Generic QAPP at \$5,000; site eligibility ~30 properties at \$250 each = \$7,500; access agreements ~30 at \$500 = \$15,000; routine Phase I ESAs ~30 at \$4,500 = \$135,000; complex Phase I ESAs ~6 at \$8,000 = \$48,000; Site Specific QAPP ~12 at \$2,000 = \$24,000; Phase II ESAs ~12 at an average \$19,200 = \$230,400)
- **Remedial and End Use Planning: Personnel:** \$7,500 hazardous waste (30 hrs at \$50/hr), \$7,500 petroleum (30 hrs at \$50/hr) **Contractual:** \$9,600 hazardous waste, \$6,400 petroleum (Analysis of Brownfields Cleanup Alternatives (ABCAs) 3 hazardous waste, 2 petroleum at \$3,200 each)
- **Program Management: Personnel:** \$17,500 hazardous waste (350 hrs at \$50/hr), \$17,500 petroleum (350 hrs at \$50/hr) to oversee Coalition communication, quarterly reports and ACRES reporting. **Travel:** \$6,000; 2 people to attend grantee training workshop and one National Brownfields Conference (NBC). Per person: \$200 mileage, \$700 airfare for NBC, 6 nights hotel \$1500, \$600 per diem and incidentals **Contractual:** \$8,000 hazardous waste, \$8,000 petroleum; (Quarterly Reports 10 at \$800 = \$8,000; 10 ACRES database updates at \$500 per = \$5,000; prepare final report 1@ \$3,000) **Supplies:** \$2,000

3.c. Measuring Environmental Results

The Coalition will measure progress and maintain alignment with the scope of work by utilizing internal systems to track, monitor, and document progress, local evaluation and tracking methods, creating quarterly reports and monitoring adherence to timeline from designated work plan. This will include short term outputs such as the number of Phase I ESAs and Phase II ESAs completed, number of ABCAs completed, number of community involvement meetings and attendance at each and acres ready for reuse. Long term outputs may include acres that have been redeveloped, jobs created, leveraged investment and number of cleanup activities that occur. EPA's ACRES database to record, track, measure and evaluate progress will also be used.

4. PROGRAMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure and 4.a.ii. Description of Key Staff

TRPDD represents the internal capability and external support to successfully administer brownfields grant funds. As detailed in Section 4.a.i. project management and grant administration responsibilities will be conducted by the TRPDD Project Manager, Jenny Savely. Savely will be assisted by the Community and Economic Development Division team at TRPDD who have more than 40 years' collective expertise with timely, compliant grant administration and financial oversight. John Byers, Division Director, will assist with financial management of the project and be responsible for funding withdrawals in the case that Jenny is unavailable. TRPDD will also be supported by a team of grant support staff from each of the three Coalition communities from New Albany, Pontotoc and Tupelo. Each Coalition member will assist in identifying leveraged funds and prospective redevelopment opportunities and will be central to ensuring adherence to grant guidelines through oversight of community engagement and redevelopment processes.

4.a.ii. Acquiring Additional Resources

The Coalition has begun working with EPA Region 4 and State MDEQ brownfields program for direction regarding initial inventory, brownfield assessment and remediation, and redevelopment planning. Post grant award of the FY20 Assessment grant, the Coalition will, through a public RFQ process, solicit the services of a Qualified Environmental Professional with experience working with these entities. The firm will consult on conducting further Brownfields Inventory, Community Outreach, Phase I and Phase II ESAs, developing Quality Assurance Project Plans, ABCAs and working with MDEQ regarding solid waste issues, brownfield assessment and remediation, and redevelopment planning. The selected firm will assist with project management and performance of environmental assessment activities. The Coalition's expertise and experience along with their partnerships and the contracted environmental firm will ensure the timely and successful expenditure of funds and completion of all technical administrative and financial requirements of the project and grant.

4.b. Past performance and accomplishments

4.b.ii. (1) Purpose and Accomplishments

TRPDD has not received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements. TRPDD manages multiple local, State, and Federal grants on an ongoing basis to serve the TRPDD region, as seen below in current grants similar to EPA's.

Awarding Agency	Description	Purpose/Outputs/Outcomes
Mississippi Development Agency Community Development Block Grant, Economic Development funds	Three-year grant \$1,420,000.00 Awarded	Site preparation and water and wastewater utility improvements to provide for the expansion of Homestretch, Inc. furniture manufacturing. This project will provide 72 new full-time permanent positions, 51% of which are low to moderate income individuals.
Federal Highway Grant, Mississippi Department of Transportation	Three-year grant \$553,589.00 Awarded, Complete	Sidewalk and infrastructure for Safe Route To Schools Program to increase healthy and safe alternatives for travel to and from campus and reduce negative environmental outcomes from burning fuels.
Appalachian Regional Commission	Three-year grant \$250,000.00 Awarded, Complete	Site improvements and building for Calhoun County Health Services to include an ambulance receiving bay and rehabilitation center.

4.b.ii. (2) Compliance with Grant Requirements

As shown through TRPDD's record of no audit findings, compliance on each grant has been achieved. All required reporting and conditions have been conducted on time and in full compliance of granting entity requirements. Many of these tasks are similar to those that required under the EPA Grant, including time restrictions, quarterly updates, and close-out reporting. Past performance and engagement with the community ensure that successful administration and management of brownfields assessment grant funds. TRPDD has no open or previous EPA Brownfields grants and has indicated that 30% or more of grant funds will be spend on eligible reuse activities for brownfields sites.

THRESHOLD CRITERIA RESPONSE

Assessment Coalition Application

STATEMENT OF ELIGIBILITY

Supported by the following documentation, Three Rivers Planning and Development District affirms that it is eligible for funding through the Environmental Protection Agency (EPA) Brownfields Assessment Grant program due to its status as an instrument of local government and the designated Regional Planning and Development entity by the Mississippi State Executive Department, and confirmed by the U.S. Economic Development Administration (EDA). TRPDD also maintains designation under section 501(c)(3) of the Internal Revenue Code. As such, TRPDD is eligible for application as the following:

- Redevelopment Agency
- Nonprofit Organization




U.S. DEPARTMENT OF COMMERCE
Economic Development Administration
ATLANTA REGIONAL OFFICE
Suite 1820
401 West Peachtree St., N.W.
Atlanta, Georgia 30308-3510

OCT 11 1990

MEMORANDUM FOR: Executive Directors
Mississippi Planning and
Development Districts

FROM:


Charles E. Oxley
Director, Atlanta Region

SUBJECT: Status of Mississippi Planning and
Development District (PDDs)

The Mississippi PDDs were organized in the mid to late 1960's by the units of local governments which they serve. The units of local governments (counties and cities) were aided in their organizing efforts by EDA grants to the State of Mississippi. The individual PDD budgets were funded by grants from EDA, with appropriate shares from units of local governments. Since their beginning, at which time EDA was the only Federal funding source, the PDDs have been encouraged to utilize all available resources, Federal, state and local, to expand their services to meet the needs of local governments. With their boards being comprised of a majority of local elected officials and their purpose being to serve local governments, the Economic Development Administration considers the PDDs to be instrumentalities of local governments and has treated them as such even though they were established as nonprofit organizations. This consideration has recently been confirmed by the Chief Counsel for EDA who has also determined that personnel and officers of the PDD organizations will not be subject to name checks.

The Office of Inspector General (OIG), U.S. Department of Commerce, is the cognizant Federal Audit Agency for Economic Development Districts, as assigned by the Office of Management and Budget under the Intergovernmental Cooperation Act. The OIG has considered the Mississippi PDDs as instruments of local government and has performed audit functions, as such, using OMB Circulars A-87 and A-128 issued pursuant to the single audit act. The OMB Circular A-128 supersedes Attachment P "audit requirements" of Circular A-102. The Office of Inspector General has issued instructions at various times to the PDDs and their auditors for complying with the requirements of OMB Circular A-128 and has reviewed audits accordingly.

Some of the recent (FY 1990) 301(b) Planning and Administrative Grant offers (Form CD-450) refer to OMB Circular A-110. Those grants are now considered to be subject to the requirements of 15 CFR Part 24 (53 Fed. Reg. 8048-9; 8087-8103, March 11, 1988), which is generally referred to as the common rule, rather than OMB Circular A-110.

State of Mississippi



Office of Secretary of State Jackson

*I, Heber Ladner, Secretary of State, do certify that the Charter of
Incorporation hereto attached entitled the Charter of Incorporation of*

THREE RIVERS PLANNING & DEVELOPMENT DISTRICT

*was, pursuant to the provisions of Title 21, Code of Mississippi of
1942, as amended, Recorded in the Records of Incorporations in
this office, in* PHOTOSTAT BOOK, NUMBER ONE-HUNDRED NINETY-ONE,

PAGES 29 - 36.



*Given under my hand and the Great Seal of
the State of Mississippi hereunto affixed this*

THIRTEENTH day of October, 1971.

Heber Ladner

Secretary of State

State of Mississippi



EXECUTIVE

OFFICE

JACKSON

The within and foregoing Charter of Incorporation of

THREE RIVERS PLANNING & DEVELOPMENT DISTRICT

is hereby approved.

In testimony whereof, I have hereunto set
my hand and caused the Great Seal of
the State of Mississippi to be affixed
this 12th day of October A. D., 1971.



John Bell Williams
Governor

By the Governor

Heber Ladner
Secretary of State

Mississippi
Executive Department
Jackson

EXECUTIVE ORDER NO. 81

WHEREAS, Public Law 90-577, the Intergovernmental Cooperation Act of 1968, and Part IV of U.S. Office of Management and Budget Circular No. A-95, Revised, encourage the States "to exercise leadership in delineating and establishing a system of planning and development districts or regions in each State, which can provide a consistent geographic base for the coordination of Federal, State, and local development programs" in order to "minimize inconsistency among Federal administrative and approval requirements placed on State, regional, and metropolitan development planning activities" and to "eliminate overlap, duplication, and competition in State and local planning activities assisted or required under Federal programs and to encourage the most effective use of State and local resources available for development planning"; and

WHEREAS, Office of Management and Budget Circular No. A-95 requires that "prior to the designation or redesignation (or approval thereof) of any planning and development district or region under any federal program, Federal agency procedures will provide a period of thirty (30) days for the Governor(s) of the State(s) in which the district or region will be located to review the boundaries thereof and comment upon its relationship to planning and development districts or regions established by the State," and "where the State has established such planning and development districts, the boundaries of designated areas will conform to them unless there is clear justification for not doing so"; and

WHEREAS, an increasing number of federal, State, and local assistance programs require a sub-state, multi-jurisdictional structure in order to preserve the eligibility of State and local governments to participate in certain federally-assisted programs and projects; and

WHEREAS, the following sub-state, multi-jurisdictional organizations have been established by local governments and supported by local public revenues under the provisions of Section 2911.3 and Sections 2890.5-01 through 2890.5-08, Mississippi Code of 1942, Recompiled; and

WHEREAS, these multi-county districts have been organized with boundaries which represent natural, social, and economic relationships, and these districts have proved to be effective in the planning, coordination, and administration of public programs and projects;

NOW, THEREFORE, I, John Bell Williams, Governor of the State of Mississippi, pursuant to the authority vested in me, do hereby designate and recognize the following as Mississippi's official Planning and Development Districts for the geographic areas and jurisdictions which they serve:

1. North Delta Planning and Development District, consisting of Coahoma, DeSoto, Panola, Quitman, Tallahatchie, Tate, and Tunica Counties;
2. South Delta Planning and Development District, consisting of Bolivar, Humphreys, Issaquena, Sharkey, Sunflower, and Washington Counties;
3. North Central Mississippi Planning and Development District, consisting of Attala, Carroll, Grenada, Holmes, Leflore, Montgomery, and Yalobusha Counties;
4. Golden Triangle Planning and Development District, consisting of Choctaw, Clay, Lowndes, Noxubee, Oktibbeha, Webster, and Winston Counties;
5. Three Rivers Planning and Development District, consisting of Calhoun, Chickasaw, Itawamba, Lafayette, Lee, Monroe, Pontotoc, and Union Counties;
6. Northeast Mississippi Planning and Development District, consisting of Alcorn, Benton, Marshall, Prentiss, Tippah, and Tishomingo Counties;
7. Central Mississippi Planning and Development District, consisting of Copiah, Hinds, Madison, Rankin, Simpson, Warren, and Yazoo Counties;
8. East Central Mississippi Planning and Development District, consisting of Clarke, Jasper, Kemper, Lauderdale, Leake, Neshoba, Newton, Scott, and Smith Counties;
9. Southern Mississippi Planning and Development District, consisting of Covington, Forrest, George, Greene, Hancock, Harrison, Jackson, Jefferson Davis, Jones, Lamar, Marion, Pearl River, Perry, Stone, and Wayne Counties; and
10. Southwest Mississippi Planning and Development District, consisting of Adams, Amite, Claiborne, Franklin, Jefferson, Lawrence, Lincoln, Pike, Walthall, and Wilkinson Counties.

Pursuant to Part IV of U.S. Office of Management and Budget Circular No. A-95, Revised, and the Intergovernmental Cooperation Act of 1968, all federal agencies are requested to recognize and utilize the boundaries of these districts.

All State agencies are encouraged to recognize and utilize the boundaries of these districts in State and sub-state planning and program development activities.

June 11, 1971

In those cases in which it is not feasible for a State or federal agency to adhere to the Planning and Development District boundaries, each agency is encouraged to adjust its State and sub-state planning and program development activities to include all of one or more Planning and Development Districts or to include jurisdictions solely within the boundaries of the districts.

The Coordinator of Federal-State Programs, Office of the Governor, shall be the principal agency to advise and consult with the Planning and Development Districts, to assist them in participating in appropriate federal and State programs, and to coordinate the activities of the Planning and Development Districts so that they may constitute a unified and cohesive effort in carrying out overall State planning and development policies and programs.

Copies of this Order shall be provided to the Office of Management and Budget, Executive Office of the President, for the appropriate guidance of federal agencies and to all heads of State agencies. This Order shall become effective July 1, 1971.



IN WITNESS WHEREOF, I have hereunto set my hand and caused the Great Seal of the State of Mississippi to be affixed.

DONE at the City of Jackson, this eleventh day of June, A. D., 1971.

GOVERNOR

BY THE GOVERNOR:

Heber Ladner

SECRETARY OF STATE

Internal Service
District Director

Department of the Treasury

Date: APR 18 1978

Person to Contact:
R. Wright
Telephone Number:
(904) 791-2636
Refer Reply to:
720-2

▷ Three Rivers Planning and Development District
99 Center Ridge Drive
Pontotoc, Mississippi 38863

Advance Ruling Period Ends:
June 30, 1980

REGISTERED MAIL

Employer Identification Number:
64-0507939

Dear Applicant:

Based on the information you supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code effective November 9, 1977.

Your exemption is not effective on the date you were formed because you did not file your application for recognition of exemption within 15 months from the end of the month in which you were organized as required by section 1.508-1(a)(2)(i) of the Income Tax Regulations. You were organized on October 7, 1971 and your application for recognition of exemption was filed on November 9, 1977.

~~You have not been determined to be a private foundation within the meaning of section 513(c) of the Code because you are not organized exclusively for exempt purposes. See page 3~~

You are not liable for social security (FICA) taxes for periods beginning after the effective date of your exemption unless you file a waiver of exemption certificate as provided in the Federal Insurance Contributions Act. You are not liable for the taxes imposed under the Federal Unemployment Tax Act (FUTA), for periods beginning on or after the effective date of your exemption.

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However you are not automatically exempt from other Federal excise taxes.

Donors may deduct contributions to you as provided in section 170 of the Code if donated on or after the effective date of your exemption. Bequests, legacies, devises, transfers, or gifts to you for your use are deductible for Federal estate and gift tax purposes under sections 2055, 2106 and 2522 of the Code if made after the effective date of your exemption.

If your purposes, character, or method of operation is changed, you must let us know so we can consider the effect of the change on your exempt status. Also, you must inform us of all changes in your name and address.

If your gross receipts each year are normally more than \$10,000, you are required to file Form 990, Return of Organization Exempt From Income Tax, by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of \$10 a day, up to a maximum of \$5,000, for failure to file a return on time.

You are not required to file Federal income tax returns for periods beginning on or after the effective date of your exemption unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

P.O. Box 35045, Jacksonville, Fla. 32202

RC SE Form EP/EO-48 (Rev. 7-77)

You are required to file Federal income tax returns, Form 1120 or Form 1041, and when due, Federal Employment Tax Returns on Form 941 and Federal Unemployment Tax Returns, Form 940 for all years prior to the effective date of this exemption.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

If you do not agree to our proposed determination, we recommend that you request a conference with a member of our Regional Office Conference Staff. Your request for a conference should include a written appeal signed by an authorized officer giving the facts, law, and any other information to support your position as explained in the enclosed Publication 892. If you are to be represented by someone who is not one of your authorized officers, he/she will need to file a power of attorney or tax information authorization and be qualified to practice before the Internal Revenue Service as provided in Treasury Department Circular No. 230. The conference may be held at the Regional Office or, if you request, at any mutually convenient District Office.

Section 7428 of the Internal Revenue Code, enacted October 4, 1976, entitles you to file a petition for a declaratory judgment in the United States Tax Court, the United States Court of Claims, or the United States District Court for the District of Columbia with respect to this determination. However, section 7428(b)(2) of the Code provides in part that "A declaratory judgment or decree under this section shall not be issued in any proceeding unless the Tax Court, the Court of Claims, or the district court of the United States for the District of Columbia determines that the organization involved has exhausted administrative remedies available to it within the Internal Revenue Service".

If we have not received an appeal within 30 days, this will become our final determination letter. Your failure to exercise your appeal rights will be considered by the Internal Revenue Service as a failure to exhaust your available administrative remedies.

Sincerely yours,

Charles O. De Witt

District Director

Enclosure:
Pub. 892

Three Rivers Planning and Development District

Because your exemption is effective on the date your application was filed, we are unable to use financial support received before the effective date of exemption to make a final determination of your foundation status under section 509(a) of the Code. However, we have determined that you can reasonably be expected to be a publicly supported organization of the type described in section 509(a)(1) and 170(b)(1)(A)(vi).

Accordingly, you will be treated as a publicly supported organization, and not as a private foundation, during an advance ruling period. This advance ruling period begins on the effective date of status and ends on June 30, 1980.

Within 90 days after the end of your advance ruling period, you must submit to us information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, you will be classified as a section 509(a)(1) or 509(a)(2) organization so long as you continue to meet the requirements of the applicable support test. If, however, you do not meet the public support requirements during the advance ruling period, you will be classified as a private foundation for future periods. Also, in the event you are classified as a private foundation, you will be treated as a private foundation from the date of your inception for purposes of sections 507(d) and 4940.

Grantors and donors may rely on the determination that you are not a private foundation until 90 days after the end of your advance ruling period. In addition, if you submit the required information within the 90 days, grantors and donors may continue to rely on the advance determination until the Service makes a final determination of your foundation status. However, if notice that you will no longer be treated as a section 509(a)(1) organization is published in the Internal Revenue Bulletin, grantors and donors may not rely on this determination after the date of such publication. Also, a grantor or donor may not rely on this determination if he was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of section 509(a)(1) status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section 509(a)(1) organization.

This determination letter modifies our letter of February 26, 1973 holding you exempt under section 501(c)(4) to the extent that it is inconsistent with this letter.

BROWNFIELDS ASSESSMENT COALITION
MEMORANDUM OF AGREEMENT BETWEEN THE FOLLOWING PARTIES:
Three Rivers Planning and Development District, The City of New Albany, The City of
Pontotoc, and The City of Tupelo in the State of Mississippi

This Memorandum of Agreement documents the roles and responsibilities of the various parties involved in the Assessment Coalition with regard to Three Rivers Planning and Development District application for an EPA Brownfields Assessment Grant.

1. This agreement addresses any EPA awarded Cooperative Agreement to the Lead Coalition Member, Three Rivers Planning and Development (TRPDD) for the 2020 period. TRPDD is responsible to EPA for management of the cooperative agreement and compliance with the statutes, regulations, and terms and conditions of the award, and ensuring that all members of the coalition are in compliance with the terms and conditions during the designated grant period.
2. It is the responsibility of TRPDD to provide timely information to the other Coalition Partners regarding the management of the cooperative agreement and any changes that may be made to the cooperative agreement over the period of performance.
3. The Coalition Partners are The City of New Albany, The City of Pontotoc, and The City of Tupelo. The contact information of project managers of each Partner is as follows:

City of New Albany
Frankie Roberts, City Clerk
P.O. Box 56, New Albany, MS 38652
662-534-1010
namayor@visitnewalbany.com

City of Pontotoc
Bob Peeples, Mayor
116 N. Main St., Pontotoc, MS 38863
662-489-4321
bpeeples@ci.pontotoc.ms.us

AND

City of Tupelo
Terri Blissard, Grant Administrator
P.O. Box 1485, Tupelo, MS 38804
662-841-6513
terri.blissard@tupeloms.gov

4. Activities funded through the cooperative agreement may include inventory preparation, site selection criteria development, assessments, planning (including cleanup planning) relating to brownfield sites, and outreach materials and implementation, and other eligible activities. TRPDD may retain consultant(s) and contractors under 40 CFR 30.36 to undertake various activities funded through the cooperative agreement and may award subgrants to other coalition members under 40 CFR 31.37 for assessment projects in their geographic areas. Subgrantees are accountable to TRPDD for proper expenditure of funds.
5. The Lead Coalition Member will procure the consultant(s) in compliance with 40 CFR 31.36 requirements. The Lead Coalition Member will issue the Request for Proposals or Request for Qualifications and will be the entity responsible for receipt of the submitted proposals and selection


and award of contracts. TRPDD will consult with other coalition members in making selections of consultants and contractors and negotiating the terms of agreements.

6. The Lead Coalition Member, in consultation with the Coalition Partners, will work to develop a site selection process based on agreed upon factors and will ensure that a minimum of five sites are assessed over the life of the cooperative agreement. Selected sites will be submitted to EPA for prior approval to ensure eligibility. Note: *Lead Coalition member and each of the Coalition Partners may agree upon a minimum number of sites assessed per member at the start of the cooperative agreement to ensure equitable distribution of funds across all members' jurisdictions.*
7. Upon designation of the specific sites, it will be the responsibility of TRPDD to work with the coalition member in whose geographic area the site is located to finalize the scope of work for the consultant or contractor. It will be the responsibility of this member to obtain all required permits, easements, and/or access agreements as may be necessary to undertake assessments at the selected site. If this member does not have the capacity to perform these activities TRPDD may assist in securing necessary site access agreements and permits.
8. The Lead Coalition Member is responsible for ensuring that other activities as negotiated in the workplan, such as community outreach and involvement, are implemented in accordance with a schedule agreed upon by TRPDD and the coalition member in whose geographic area the site to be assessed is located.
9. Each Coalition member will assist in identifying leveraged funds and prospective redevelopment opportunities and will be central to ensuring adherence to grant guidelines through oversight of community engagement and redevelopment processes.


Agreed:


Vernon R. Kelley, Executive Director
Three Rivers Planning and Development

11/25/19
Date


Tim Kent, Mayor
City of New Albany

11-22-19
Date


Bob Peeples, Mayor
City of Pontotoc

11/8/2019
Date


Jason Shelton, Mayor
City of Tupelo

11-19-19
Date

DESCRIPTION OF COMMUNITY INVOLVEMENT

TRPDD will develop a Community Involvement Plan (CIP) as part of Task 1 to guide meaningful and effective methods of engaging the community throughout the project. Assessing community needs and locating resources to address them is the heart of any community development effort. Vital to TRPDD's commitment to community engagement is ensuring public access to information and programming, maintaining partnerships with local, state, and federal organizations, and relying on citizen participation to guide all of our efforts. Partnerships with stakeholders and citizens allows for cooperatively strategizing with cohesive and coherent objectives to maximize resource capacity and include diverse voices in strategic planning. The process of identifying and selecting sites for possible assessment and final inventory has and will rely heavily on information from and in close consultation with the elected leadership, local community developers, and private citizens of each Coalition member municipality, beginning with the formation of the Brownfields Advisory Committee (BAC) upon award under the consultation of a procured Qualified Environmental Professional (QEP) (See Section 2.b.iii.). The BAC will conduct quarterly public meetings as well as additionally as needed alongside the progress of Phase I and Phase II ESAs and the development of Remedial End Use Plans to develop and inventory of sites for assessment, make final site selection, and develop strategic plans for each site including cleanup alternatives and redevelopment plans. Additionally, already occurring Board meetings among Coalition members and municipalities and counties in the TRPDD region will address brownfield site redevelopment opportunities and availability to developers and stakeholders. Through this TRPDD and the Coalition advocate for locals by providing information, a platform to voice their ideas and needs, and a space to be an active part of the work.

At present, the Coalition has reached out to local community organizations through direct communication, community meetings, respective Board meetings, and has received a great deal of support for this endeavor and gained committed partners (See Narrative Proposal Section 2.b.i.). Rigorous community feedback efforts and outreach through public meetings, advertisement with local media, social media announcements, and publically available web-based data as well as at physical locations will expand the impact of the project into municipalities beyond the Coalition to expand impact into the TRPDD regional footprint. Community based organizations and their platforms will also be utilized to receive continued feedback from residents and stakeholders. These actions will include: Public Service Announcements (PSAs), monthly progress updates posted on the TRPDD website with responses to questions and comments provides in monthly website and print media updates, copies of Phase I and II ESAs and Cleanup Plans in local libraries, documents produced using grant funds, and Brownfield project informational material at Coalition member offices and public venues in the community. This model promotes an asset and place-based paradigm defining communities by their needs and resources with the influence of stakeholder and citizen participation.

Many inventory sites are currently owned by municipality members of the Coalition. Beyond this, access to priority sites in target communities have been gained with continued efforts to establish relationships with property owners of other parcels. The Coalition is confident relationships with property owners and community members is such that obtaining sufficient access to sites will more than allow funding to be fully allocated within three years.

STATEMENT OF ASSESSMENT GRANT ACTIVITY

Neither Three Rivers Planning and Development District nor any Three Rivers Brownfields Assessment Coalition members have an active EPA Brownfields Assessment Grant.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/02/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

MS

8. APPLICANT INFORMATION:

* a. Legal Name: Three Rivers Planning and Development District

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0304295670000

d. Address:

* Street1:

P.O. Box 690

Street2:

* City:

Pontotoc

County/Parish:

Pontotoc

* State:

MS: Mississippi

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

38863-2914

e. Organizational Unit:

Department Name:

Division Name:

Community and Economic Develop

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Jenny

Middle Name:

* Last Name:

Savely

Suffix:

Title: Project Manager

Organizational Affiliation:

Three Rivers Planning and Development District

* Telephone Number:

662-489-2415

Fax Number:

662-489-6815

* Email:

jsavely@trpdd.com

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

X: Other (specify)

Type of Applicant 2: Select Applicant Type:

E: Regional Organization

Type of Applicant 3: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

* Other (specify):

Redevelopment Agency

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Three Rivers Planning and Development Brownfields Assessment Coalition

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="600,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed:

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FY20 EPA Coalition Assessment Grant

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Application**

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